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Attorneys for JPMorgan Chase Bank, National Association
L&A Case No. 15.64282.3

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

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|---|-----------------------------|
| In re: | Bankruptcy No. 12-31819 RKM |
| Afagh Mohammadreza and Hossein Rezaian, | (a Chapter 13 case) |
| Debtors. | Filed Electronically |

NOTICE OF MOTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
FOR TERMINATION OF THE AUTOMATIC STAY
AND NOTICE OF OPPORTUNITY FOR HEARING

OBJECTION DEADLINE: May 5, 2016

TO ALL PARTIES IN INTEREST:

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

Please take notice that the Motion for Termination of the Automatic Stay filed by secured creditor JPMorgan Chase Bank, National Association (“Creditor”) in this case will come for

hearing before the Honorable R. Kimball Mosier on May 18, 2016 at the hour of 10:00 am in Room 369 or such other room as may be assigned, United States Courthouse, 350 South Main Street, Salt Lake City, UT 84101.

Creditor's motion seeks an order of the Court terminating the automatic stay with respect to property (the "Property") in which debtors have a interest, said Property being located at 14029 South Candy Pull Drive, Draper, in Salt Lake County, Utah, 84120, and more particularly described as follows:

All of Lot 309, SOUTH MOUNTAIN PHASE I SUBDIVISION AMENDED, according to the official plat thereof, recorded July 31, 1995, in Book 95-7, at Page 183, in the Office of the Salt Lake County Recorder.

Together with all the improvements now or hereafter erected on the property, and all easements, appurtenances, and fixtures now or hereafter a part of the property.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant relief from the automatic stay, or if you want the Court to consider your views on the motion, then, on or before May 5, 2016 (14 days from the date of this notice plus 3 days for mailing), you or your attorney must:

1. File with the Court a written response explaining your position at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your response to the Court for filing, you must mail it early enough so the

Court will **receive** it on or before the date stated above.

2. Serve a copy of your response upon the following via ECF or U.S. Mail:

Lundberg & Associates, PC
3269 South Main Street, Suite 100
Salt Lake City, UT 84115
Attorneys for Creditor

Lon Jenkins
405 South Main Street
Suite 600
Salt Lake City, UT 84111
Trustee

3. Attend the hearing scheduled to be held as set forth in this notice. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you intend to call witnesses or make a presentation of facts or law at this hearing that will extend beyond 5 minutes, please inform Lundberg & Associates, PC at once at (801) 263-3400 so that, in the event time for such presentation is inadequate, the hearing may be rescheduled on a date when there will be sufficient time on the Court's calendar.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting relief.

In the absence of a timely response/objection, the relief sought in the Pleading may be granted without a hearing under 11 U.S.C. Section 102(1) and Local Court Rule 4001.1.

Be further advised that the debtors and Creditor may, without further notice or hearing,

settle between themselves the issue raised by Creditor's motion pursuant to stipulation which allows the debtors to cure their post-petition arrearage and grants relief from the automatic stay to the Creditor in the event the debtors fail to comply with the terms of the stipulation.

DATED: April 18, 2016.

LUNDBERG & ASSOCIATES, PC

By: /s/ Tom Cook

Tom Cook
Attorney for Creditor

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I certify that, on April 18, 2016, I electronically filed the Motion for Termination of the Automatic Stay, Supplemental Declaration in Support of Motion for Relief from Automatic Stay, and the foregoing Notice of Opportunity for Hearing, with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system:

Justin O. Burton
Rulon T. Burton, & Assoc.
jeff@rulontburton.com
ECF
Attorney for Debtors

Lon Jenkins
utahtrusteemail@ch13ut.org
ECF
Chapter 13 Trustee

/s/ Tom Cook
Tom Cook

CERTIFICATE OF SERVICE – MAIL, OTHER

I certify that, on April 18, 2016, I caused to be served a true and correct copy of the Motion for Termination of Automatic Stay, Supplemental Declaration in Support of Motion for Relief from Automatic Stay, and foregoing Notice of Opportunity for Hearing, as follows:

Mail Service – By regular first class United States mail, postage fully pre-paid addressed to:

Hossein Rezaian
Afagh Mohammadreza
14029 South Candy Pull Drive
Draper, UT 84020
Debtors

/s/ Tom Cook
Tom Cook